## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

CLARA FINCH CRUZ, M.D.

**PLAINTIFF** 

VS.

Civil. No. 2:18-cv-2483-JPM-tmp

ROBERT WILKIE, SECRETARY, U.S. DEPARTMENT OF VETERANS AFFAIRS

**DEFENDANT** 

## NOTICE TO TAKE DEPOSITION OF THOMAS FERGUSON, M.D.

COMES NOW, Plaintiff, Clara Finch Cruz, by and through her counsel of record, and gives notice that Plaintiff will take the deposition of Thomas Ferguson, M.D., commencing on Friday, November 15, 2019, at 8:30 a.m. The deposition will take place at, Johnson and Bennett, PLLC, located at 1331 Union Ave., Ste., 1226, Memphis, TN 38104 and shall be recorded by stenographic means and will continue from day to day until examination of the witness is complete. The deposition will be recorded by stenographic/audio means. The parties are invited to appear and take part in whatever form is convenient to them.

THIS the 19<sup>th</sup> day of September, 2019.

Respectfully submitted,

Clara Finch Cruz,

/s/ Kristy L. Bennett
Kristy L. Bennett BPR #30016
Tressa V. Johnson BPR #26401
JOHNSON AND BENNETT, PLLC
1331 Union Avenue, Suite 1226
Memphis, TN 38104
(901) 402-6830 (direct)
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tressa@myjbfirm.com

## **CERTIFICATE OF SERVICE**

I, Kristy L. Bennett, one of the attorneys for the Plaintiff, do hereby certify that I have this day served via ECF filing or by United States mail, postage prepaid, a true and correct copy of the above and foregoing document to the following counsel of record:

Monica M. Simmons-Jones Reagan Fondren United States Attorney's Office 167 North Main Street, Suite 800 Memphis, TN 38103 monica.simmons@usdoj.gov reagan.fondren@usdoj.gov

THIS the 19th day of September, 2019.

/s/ Kristy L. Bennett
Kristy L. Bennett